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Agency Secretary
Cal/EPA



Department of Toxic Substances Control

5796 Corporate Avenue
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Arnold Schwarzenegger
Governor

October 5, 2004

Mr. Bob Fischer
Installation Restoration Program Manager
1605 Third Street, Building 504, Code 45RF
Naval Air Facility El Centro
El Centro, California 92243-5001

FINAL TECHNICAL MEMORANDUM EXTENDED SITE INVESTIGATION
INSTALLATION RESTORATION (IR) SITE 10, SEWAGE STABILIZATION PONDS 2
AND 3, NAVAL AIR FACILITY EL CENTRO (NAFEC), IMPERIAL COUNTY,
CALIFORNIA

Dear Mr. Fischer:

The Department of Toxic Substances Control (DTSC) reviewed the Final Technical Memorandum (FTM) for Site 10 – Sewage Stabilization Ponds 2 and 3 dated March 2004. The report presents results of an Extended Site Investigation (ESI) conducted at IR Site 10. Activities conducted during the ESI included surface soil sampling performed from January through April 2001 and groundwater sampling performed in September 2003.

IR Site 10 consists of three unlined ponds with bermed sides. The total area of Site 10 is approximately 6 acres. Initial investigations of these three ponds indicated the presence of priority pollutant metals, petroleum hydrocarbons, low levels of several volatile organic compounds (VOCs), three semi-volatile organic compounds (SVOCs), DDE, Polychlorinated Biphenyls (PCBs), cyanide, phenol, and organolead that pose a threat to human health and the environment.

The Draft Technical Memorandum (DTM) submitted in July of 2001 addressed only Ponds 2 and 3. DTSC submitted comments on the DTM on September 10, 2001 and on January 15, 2002 and did not concur with the Navy's recommendation for a No Further Action (NFA) decision.

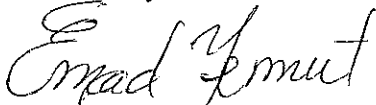
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In the response to our comments on the DTM, the Navy stated that "Ponds 2 and 3 will be included in the Engineering Evaluation/Cost Analysis (EE/CA) which will evaluate all of IR Site 10 to determine the area that may be subject to removal". In the conclusion section of the FTM it is also stated that "it is likely that a recommendation for NFA will be made for one or both of Ponds 2 and 3".

A NFA recommendation in the EE/CA for Ponds 1 and 2 will not be accepted by DTSC as previously stated in our comments. Pond 3 may qualify for a NFA but Ponds 1 and 2 have contamination above the action levels and will require remediation. The EE/CA should provide a detailed evaluation of the remedial actions in accordance with the nine criteria of the National Contingency Plan for all three ponds.

We are looking forward to working with you to expedite the remedial activities at NAFEC. If you have any questions, please contact Mr. Isaac Hirbawi at (714) 484-5445 or at ihirbawi@dtsc.ca.gov.

Sincerely,



Emad B. Yemut, P.E.
Unit Chief
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